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Attorney for **Benjamin D. Morrow**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA	Case No. 3:19-cr-00041-MMD-WGC
Plaintiff,	
vs.	**ORDER GRANTING PETITIONER MORROW'S UNOPPOSED MOTION AND DECLARATION IN SUPPORT THEREOF FOR EXTENSION OF TIME TO FILE TRAVERSE**
BENJAMIN D. MORROW	
Defendant.	

MOTION FOR EXTENSION OF TIME TO FILE REPLY/TRAVERSE

Pursuant to Rule 6 of the *Federal Rules of Civil Procedure*, counsel for Petitioner hereby requests a 60-day extension of time to file Petitioner's Traverse up to and including Friday, August 1, 2025.

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<u>DECLARATION IN SUPPORT OF MOTION</u>

I, Jason T. Campbell, am the attorney of record for Petitioner Benjamin Morrow in this

case. I hereby declare as follows in support of this request for extension of time to file

Petitioner's Traverse:

    1.   <u>Current due date</u>:   June 2, 2025

On November 12, 2024, I filed a motion to vacate his conviction and sentence pursuant to

28 U.S.C. § 2255 on behalf of Petitioner. (Dkt. 144.) I simultaneously moved to be admitted to

this jurisdiction *pro hac vice* in order to continue representing Petitioner in these proceedings,

and the Court granted my motion on November 26, 2024. (Dkt. 143, 152.)

On December 31, 2024, the Court issued an order to show cause, setting March 3, 2025,

as the due date for the Government's response, with Petitioner's Reply/Traverse due 30 days

later. (Dkt. 156.) The Government filed its response on March 3, 2025, making April 2, the

original due date for Petitioner's Reply/ Traverse. The Court granted my previous request for an

extension of time, and the brief is currently due on June 2, 2025.

    2.   <u>Length of Requested Extension</u>:   60 days

    3.   <u>New due date if extension granted</u>:   August 1, 2025

    4.   <u>Number of previous extensions by Petitioner</u>:   1

    5.   <u>Reason for extension request</u>:

Since I filed my previous request for an extension of time to file the Traverse in this case,

I unexpectedly received and accepted an offer of employment with a law firm in San Francisco,

CA, where I have been working for just over three weeks. As expected, some impediments have

arisen in the course of this professional transition from solo practitioner to law firm associate;

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however, I am currently settling into this new position, and I believe I will be able to file the

brief on or before August, 1, 2025.

6.   Opposing party's position: No objection

On May 27, 2025, I emailed opposing counsel, Afroza Yeasmin, and informed her of my

intention to request an extension of time to file a Traverse. She has not yet responded to my

inquiry.

Respectfully Submitted,

Dated: May 27, 2025   /s/ Jason T. Campbell
                                          Jason T. Campbell
                                          Attorney for Benjamin Morrow

IT IS ORDERED

DATED this 29th day of May, 2025.

_____
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Northern District of California by using the appellate CM/ECF system on May 27, 2025. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system. Executed on May 27, 2025, in El Cerrito, California.

/s/ Jason T. Campbell
Jason T. Campbell
Attorney for Benjamin Morrow

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